

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JANE DOE, Individually and on behalf of all
others similar situated,

Plaintiff,

v.

BAYSTATE HEALTH SYSTEM, INC.,

Defendant.

Case No.: 1:25-CV-10337-JEK

**DEFENDANT BAYSTATE HEALTH, INC.'S MOTION TO DISMISS
PLAINTIFF'S AMENDED COMPLAINT**

Defendant Baystate Health, Inc. respectfully requests this Court pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure to dismiss Plaintiff's Amended Complaint, for failure to state a claim upon which relief can be granted. This Motion is supported by the accompanying Memorandum of Law.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d) Defendant Baystate Health, Inc. respectfully requests a hearing on its Motion to Dismiss.

Dated: March 21, 2025

Respectfully submitted,

BAYSTATE HEALTH SYSTEM, INC.

By: /s/ Lisa Oliver White

Lisa Oliver White, BBO# 666841

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I, Lisa Oliver White, do hereby certify that on March 21, 2025, a true and correct copy of the foregoing document was served upon all counsel of record via the CM/ECF system of the United States District Court for the District of Massachusetts.

/s/ Lisa Oliver White
Lisa Oliver White